

FILED

APR 16 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
E. ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL E. MCCAY,

Defendant.

CRIMINAL NO. 24-30063-NJR

Title 18

United States Code,

Sections 2251(a), (e), 2252A(a)(2)(A)(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

SEXUAL EXPLOITATION OF A MINOR

From on or between April 8, 2023 and May 2, 2023, in Saint Clair County, within the Southern District of Illinois,

MICHAEL E. MCCAY,

defendant herein, did knowingly employ, use, persuade, induce, entice, or coerce a minor, herein identified as MV1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which depicts the lascivious display of MV1's genitals, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by a computer or electronic device, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 2

SEXUAL EXPLOITATION OF A MINOR

From on or between February 2, 2023 and January 18, 2024, in Saint Clair County, within the Southern District of Illinois,

MICHAEL E. MCCAY,

defendant herein, did knowingly employ, use, persuade, induce, entice, or coerce a minor, herein identified as MV2, to engage in sexually explicit conduct for the purpose of producing a visual

depiction of such conduct, which depicts the lascivious display of MV2's genitals, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by a computer or electronic device, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 3
DISTRIBUTION OF CHILD PORNOGRAPHY

From on or between April 10, 2023 and January 18, 2024, in Saint Clair County, within the Southern District of Illinois,

MICHAEL E. MCCAY,

defendant herein, knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including 14 files containing sexually explicit conduct of MV1, that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2) and (b).

FORFEITURE ALLEGATION

Upon conviction for the offenses charged in this Indictment, defendant,

MICHAEL E. MCCAY,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and any and all property used and intended to be used in any manner or part to commit and to promote the commission of the charged offenses.

The property that is subject to forfeiture referred in the paragraph above includes, but is not limited to, the following items seized from **MICHAEL E. MCCAY**:


1. Apple iPhone 13
2. Apple iPhone 12 Pro Max
3. Apple iPhone 11

4. Apple iPhone 8
5. Apple iPhone 7
6. Apple iPhone 6S Plus
7. Apple iPhone 5S
8. Apple iPad 4

A TRUE BILL



ALEXANDRIA BURNS
Assistant United States Attorney



RACHELLE AUD CROWE
United States Attorney

